

# COMSTOCK HOMES DEVELOPMENT AND ELLWOOD MESA OPEN SPACE PLAN FEIR

## SECTION 7.0 OTHER CEQA CONSIDERATIONS

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### 7.1 INTRODUCTION

Section 15126 of the CEQA Guidelines requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the Environmental Impact Report must also identify: 1) significant environmental effects of the proposed project (Comstock Homes Development and the components of the Ellwood Mesa Open Space Plan); 2) significant environmental effects that cannot be avoided if the proposed project is implemented; 3) significant irreversible environmental changes that would result from implementation of the proposed project; 4) growth-inducing impacts of the proposed project; 5) mitigation measures proposed to minimize significant effects; and 6) alternatives to the proposed project.

Subsequent to issuance of the Draft EIR, the applicant (Comstock Homes) submitted a revised 69-unit site plan layout (Comstock Alternate 1), which would reduce but not avoid many of the significant effects associated with the proposed 78-unit project. Refer to Master Response L in Appendix E of this Final EIR for more information.

### 7.2 SIGNIFICANT ENVIRONMENTAL EFFECTS

Table ES-1 (Summary of Environmental Impacts and Mitigation Measures), which is contained in the Executive Summary of this EIR, and Sections 4.2 through 4.15 of this EIR provide a comprehensive identification of the environmental effects of the proposed project, including the level of significance both before and after mitigation.

### 7.3 SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Implementation of the proposed project would result in the following significant and unavoidable project-related impacts:

#### Air Quality

- **Residential Emissions.** Comstock Homes Development residents would produce significant ROG emissions from combined residential sources including vehicular traffic, wood burning fireplaces, space heating, water heating, and consumer products.
- **Cumulative Residential Emissions.** Emissions of ROG from project operations would result in cumulative air quality impacts in the South Central Coast Air Basin.

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- **Monarch Butterflies.** Construction of the Comstock Homes Development would place residential development within 350 feet of the “Ellwood North” monarch overwintering site. This development would also remove 190 mature eucalyptus trees along the northern and western boundary of the project site.
- **Roosting and Foraging Habitat for Raptors, Loggerhead Shrikes, and Bats.** Several special-status raptor species routinely use the Comstock Homes Development and Ellwood Mesa Open Space parcels for nesting, roosting, and foraging. The Comstock site would reduce available roosting and foraging habitat by about 18 acres. It would also increase human presence and pet activity, which disrupts foraging patterns.
- **Nesting Habitats for Raptors.** The project would place residences within 200 feet of White-Tailed Kite and Cooper’s Hawk nesting sites. Removal of 190 eucalyptus trees to accommodate the residences may cause species to abandon nest sites.
- **Native Grassland.** The Comstock Homes Development would remove 0.416 acre of native grasses as a part of the surface disturbance associated with residential development.

### Noise

- **Construction Noise - Homes.** Short-term noise levels from grading and construction activities within the Comstock Homes Development could reach maximum values of over 80 dBA near the Ellwood School, and 72 dBA at the residences to the east in Santa Barbara Shores.
- **Construction Noise - Open Space.** Short-term levels from grading and construction activities for the new parking and restroom facilities south of Hollister Avenue and east of the proposed Comstock Homes Development could reach maximum values of 80 dBA at the Ellwood School and at residences to the east.

### Recreation

- **Residential Rezone and Development.** The Comstock Homes Development would rezone the 36-acre northwestern portion of the existing Santa Barbara Shores Park and convert the site to residential use, thus displacing 0.87 miles of existing public trails, and displace the existing 15-space off-street parking area and informal on-street parking.
- **Open Space Plan Trail Closures.** Implementation of the Open Space Plan would result in closure of a portion of the existing footpaths within the City of Goleta’s Ellwood Mesa Open Space Plan area (refer to Master Response B in Appendix E for more information).

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- **Open Space Plan Trail User Restrictions.** In addition to eliminating a substantial portion of the existing trails, certain user groups (e.g., bicyclists and equestrians) would be restricted to a subset of the remaining trails.
- **Cumulative Increase in Open Space Usage.** The proposed project, in combination with other proposed projects and a general increase in population and use intensity in the Open Space Plan area, would cumulatively add to a long-term trend of increased public use, access, and activities in the Open Space Plan area.

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### Traffic and Circulation

- **Intersection Impacts.** The proposed project would generate 79 P.M. PHT at the study area intersections, resulting in a significant project impact at the Storke Road/Hollister Avenue intersection. The Storke Road/Hollister Avenue intersection is the one intersection in the study area that would be affected by not constructing the Phelps Road extension. The project would add 0.01 to the V/C ratio, resulting in a cumulatively significant impact.

### Visual Resources

- **KOP Analysis.** When the project is viewed from one of the locations on Hollister Avenue and from the open space areas south of the project site, the City of Goleta's visual thresholds would be exceeded because the development would be incompatible in appearance with surrounding recreational uses, ocean and island views would be blocked, and the Santa Ynez mountain view would be obstructed.
- **Loss of Scenic Coastal Vistas and Open Space.** Implementation of the proposed residential project would contribute to the cumulative loss of coastal open space areas and the associated visual resources.

## 7.4 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project. Specifically, Section 15126.2(c) states:

“Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

Generally, a project would result in significant irreversible environmental changes if:

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- The primary and secondary impacts would generally commit future generations to similar uses
- The project would involve a large commitment of non-renewable resources
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy)

Development of the proposed Comstock Homes Development would result in the long-term commitment of the project site to residential uses, thereby precluding any other uses for the lifespan of the project.

Resources that would be permanently and continually consumed by project implementation include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result in significant environmental impacts or the unnecessary, inefficient, or wasteful use of resources.

With respect to operational activities, compliance with all applicable building codes, as well as City Policies and the Mitigation Measures identified in this EIR would ensure that all natural resources are conserved to the maximum extent possible. Overall, the consumption of natural resources would increase at a lesser rate than the projected population increase due to the variety of energy conservation measures that the City has in place and will continue to provide.

## 7.5 GROWTH-INDUCING IMPACTS

### 7.5.1 Background

In accordance with Section 15126.2(d) of the CEQA Guidelines, an EIR must “discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.” In addition, when discussing growth-inducing impacts of a proposed project, “it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment” (Section 15126.2(d) of the CEQA Guidelines). Two issues must be considered when assessing the growth-inducing impacts of a project:

- **Elimination of Obstacles to Population Growth:** The extent to which additional infrastructure capacity or a change in regulatory structure will allow additional development in the County and region,
- **Promotion of Economic Growth:** The extent to which the proposed project can cause increased activity in the local or regional economy. Economic impacts can include direct effects, such as the direction and strategies implemented within the project area, and indirect or secondary impacts, such as increased commercial activity needed to serve the Santa

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Barbara County Association of Government's population growth forecasts for the region as well as the City of Goleta.

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### **7.5.2 Elimination of Obstacles to Population Growth**

The elimination of either physical or regulatory obstacles to population growth is considered to be a growth-inducing impact. A physical obstacle to population growth typically involves the lack of public service infrastructure. The extension of public service infrastructure, including roadways, water mains, and sewer lines, into areas that are not currently provided with these services is expected to support new development. Similarly, the elimination of or changes to a regulatory obstacle, including existing growth and development policies, can result in new population growth.

In the case of the proposed residential project, all public service infrastructure is currently available to the project site; some specific public facilities will be upgraded. In addition, the project would result in the residential development of land at locations that are immediately contiguous to existing residential development, and thus does not represent urbanization of a remote location.

### **7.5.3 Promotion of Economic Growth**

Increased industrial, commercial, and residential development typically generates a secondary or indirect demand for other services. The City's growing population will require additional goods and services, such as groceries, entertainment, and medical services that will stimulate economic activity.

Because the proposed residential project would not substantially alter the population projections adopted by the Santa Barbara County Association of Governments, the secondary effects of increased residential demand for goods and services is independent of the project. This increased demand could result in greater employment-generating uses in the region as well as the City of Goleta that could generate a secondary demand for goods and services to support new and expanding business throughout the Santa Barbara Metropolitan area, in accordance with those agencies' respective General Plans.

### **7.5.4 Summary/Conclusions**

In summary, the proposed project would indirectly induce additional population growth in the City. The City of Goleta has not yet adopted its General Plan and Local Coastal Program. Nevertheless, the City's General Plan and Local Coastal Program is anticipated to provide policies that are at least as protective as the policies used as the basis for this EIR analysis. As such, the proposed project's growth-inducing impacts are not considered to be detrimental to the environment, since this growth would be consistent with relevant existing policies.

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## **7.6 MITIGATION MEASURES PROPOSED TO MINIMIZE SIGNIFICANT EFFECTS**

Table ES-1 (Summary of Environmental Impacts and Mitigation Measures), which is contained in the Executive Summary of this EIR, and Sections 4.2 through 4.15 of this EIR provide a comprehensive identification of the environmental effects of the proposed project, and identify feasible mitigation measures to reduce the magnitude of impacts.

## **7.7 ALTERNATIVES TO THE PROPOSED PROJECT**

Alternatives to the proposed project are presented in Chapter 6.0 (Alternatives) of this EIR.